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July 5, 2022

Via ECF Filing

The Honorable Ramon E. Reyes, Jr.
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**RE: *Kaikov v. Kaikov, et. al.*, Case No. 19-cv-2521- LDH-RER
Motion to Extend Discovery Deadlines**

Dear Judge Reyes:

I am counsel for Plaintiff in the above-referenced matter. I am writing to respectfully request the Court to extend deadline for discovery of Defendant's accountant, currently set for July 7, 2022, as well as related expert discovery deadlines, as set forth below.

There are no set deadlines other than a pre-trial conference in this matter set for December 6, 2022.

On April 12, 2022, the Court, by a minute order, extended discovery deadline pursuant to a telephone request by non-party accountant Sharon Yang to June 7, 2022.

On June 7, 2022, the Court granted Ms. Yang's second motion to extend discovery by 30 days, setting the deadline to July 7, 2022.

On June 10, 2022, the Court also granted motion to extend expert discovery deadlines accordingly.

After the deadlines were set, the parties and counsel for Ms. Yang agreed that her deposition will take place on June 30, 2022.

On June 22, 2022, Ms. Yang produced approximately 4,000 (four thousand) pages of documents responsive to the subpoena. Because of the large volume of documents and other schedule conflicts, it was impossible for the undersigned to review all produced documents and be ready to take a meaningful deposition of Ms. Yang on June 30 or before the deadline of July 7, 2022. In addition, after having reviewed part of the documents, I conferred with Mr. Rodriguez, counsel for Ms. Yang, regarding further supplementing production. He requested

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that should additional documents responsive to the subpoena exist, such documents be produced by July 31.

I conferred with counsel for Ms. Yang and counsel for Defendants regarding rescheduling of the deposition. The witness and all counsel are available for a deposition during the week of August 8, 2022. Plaintiff intends to schedule the deposition of Ms. Yang on August 10, 2022, should the Court allow this. Defendants do not oppose this request.

Accordingly, Plaintiff requests that discovery of accountant and related expert discovery deadlines be extended as follows:

Accountant Deposition	August 11, 2022;
Plaintiff's Expert Report	August 26, 2022;
Defendants' Counter	October 28, 2022;
Expert Depositions	December 23, 2022.

We thank the Court for its time and effort in consideration of this matter.

Respectfully submitted,

/s/ Maria Temkin

Maria Temkin, Esq.

For: TEMKIN & ASSOCIATES, LLC

MT

Cc: All counsel of record (via ECF System)

